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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SCOTT LIEBERMAN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
AMERICA LLC and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

Defendants.

Case No. 4:11-cv-02197-RS

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Richard Seeborg

WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") and
Sony Network Entertainment International LLC ("SNEI"), as well as certain related entities

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 4:11-cv-02197-RS

1 (collectively, the "Sony Defendants"), have been named as defendants in at least twenty-five (25)
2 putative class action lawsuits within this District, to date;

3 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
4 least nineteen (19) putative class action lawsuits pending outside this District, to date;

5 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
6 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
7 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
8 2011.

9 WHEREAS, the current deadline for SCEA and SNEI to respond to the Complaint is
10 July 12, 2011;

11 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
12 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
13 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
14 JPML;

15 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
16 by and through their respective counsel, hereby stipulate as follows:

17 The deadline for the defendants to respond to the Complaint in the above-captioned action
18 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
19 litigation centralizing the above-captioned action with other matters, or if centralization is denied
20 by the JPML, then 30 days from the date of such order denying centralization.

21 ///

1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 27, 2011

SHAWN A. WILLIAMS
PAUL J. GELLER
STUART A. DAVIDSON
CULLIN A. O'BRIEN
MARK J. DEARMAN
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7 By: /s/ Shawn A. Williams /s/ [as authorized]
Shawn A. Williams
Attorneys for Plaintiff
SCOTT LIEBERMAN

10 Dated: May 27, 2011

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13 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

14 /s/ Harvey J. Wolkoff /s/
Harvey J. Wolkoff (Subject to admission
pro hac vice)

16 Attorneys for Defendants
SONY COMPUTER
ENTERTAINMENT AMERICA LLC,
and SONY NETWORK
ENTERTAINMENT INTERNATIONAL
LLC.

20 **[PROPOSED] ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23 Dated: 5/27/11

24 By: 
U. S. District Court Judge